

Executive Summary – Enforcement Matter – Case No. 48668
Enbridge G & P (North Texas) L.P.
RN102888377
Docket No. 2014-0670-AIR-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

AIR

Small Business:

No

Location(s) Where Violation(s) Occurred:

Barton Chapel Gas Plant, located on Nash Road, approximately 0.5 mile north of Highway 2210, Jack County

Type of Operation:

Natural gas processing plant

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: September 5, 2014

Comments Received: No

Penalty Information

Total Penalty Assessed: \$15,400

Amount Deferred for Expedited Settlement: \$3,080

Amount Deferred for Financial Inability to Pay: \$0

Total Paid to General Revenue: \$12,320

Total Due to General Revenue: \$0

Payment Plan: N/A

SEP Conditional Offset: \$0

Name of SEP: N/A

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Satisfactory

Major Source: Yes

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: April 2014

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: February 26, 2014 through March 12, 2014

Date(s) of NOE(s): April 25, 2014

Executive Summary – Enforcement Matter – Case No. 48668
Enbridge G & P (North Texas) L.P.
RN102888377
Docket No. 2014-0670-AIR-E

Violation Information

Failed to record inlet catalyst temperatures. Specifically, the catalyst inlet temperature readings for engines E-2 & E-3 were not recorded at all times from March 6, 2013, through June 13, 2013. The continuous parameter monitoring system ("CPMS") failed to record the 15-minute readings of inlet catalyst temperature 5,266 times for engine E-2 and 5,006 times for engine E-3. Similarly, from July 14, 2013 through December 31, 2013, the CPMS failed to record the 15-minute readings of inlet catalyst temperature 4,376 times for engine E-2 and 7,296 times for engine E-3 [30 TEX. ADMIN. CODE §§ 113.1090 and 122.143(4), 40 CODE OF FEDERAL REGULATIONS §§ 63.6625(b)(3) and 63.6655(d), TEX. HEALTH & SAFETY CODE § 382.085(b), and Federal Operating Permit No. O2953, Special Terms and Conditions No. 1.A].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The Respondent has implemented the following corrective measures:

- a. On January 16, 2014, switched the pre-catalyst exhaust temperature Programmable Logic Controllers to a new Supervisory Control and Data Acquisition System that is constantly monitored by the Gas Control group to catch and correct disconnects; and
- b. On May 10, 2014, installed the Wonder Ware System as a backup to record the measurements of catalyst inlet temperatures being taken and retains the collected data for a rolling six month period.

Technical Requirements:

N/A

Litigation Information

Date Petition(s) Filed: N/A

Date Answer(s) Filed: N/A

SOAH Referral Date: N/A

Hearing Date(s): N/A

Settlement Date: N/A

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Enbridge G & P (North Texas) L.P.
RN102888377
Docket No. 2014-0670-AIR-E

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Farhaud Abbaszadeh, Enforcement Division,
Enforcement Team 4, MC 149, (512) 239-0779; Candy Garrett, Enforcement Division,
MC 219, (512) 239-1456

TCEQ SEP Coordinator: N/A

Respondent: Danny Bull, NTX West District Manager, Enbridge G & P (North Texas)
L.P., 2600 Cherry Lane, Suite 128, Fort Worth, Texas 76116

Respondent's Attorney: Edward Lewis, Partner, Fulbright & Jaworski LLP,
Fulbright Tower, 1301 McKinney, Suite 5100, Houston, Texas 77010-3095



Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

TCEQ

DATES	Assigned	28-Apr-2014	Screening	5-May-2014	EPA Due	20-Jan-2015
	PCW	10-May-2014				

RESPONDENT/FACILITY INFORMATION

Respondent	Enbridge G & P (North Texas) L.P.		
Reg. Ent. Ref. No.	RN102888377		
Facility/Site Region	3-Abilene	Major/Minor Source	Major

CASE INFORMATION

Enf./Case ID No.	48668	No. of Violations	1
Docket No.	2014-0670-AIR-E	Order Type	1660
Media Program(s)	Air	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Farhaud Abbaszadeh
		EC's Team	Enforcement Team 4
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$14,000
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ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History	20.0% Enhancement	Subtotals 2, 3, & 7	\$2,800
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Notes: Enhancement for one order with a denial of liability.

Culpability	No	0.0% Enhancement	Subtotal 4	\$0
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Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments	Subtotal 5	-\$1,400
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Economic Benefit	0.0% Enhancement*	Subtotal 6	\$0
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Total EB Amounts: \$147
Approx. Cost of Compliance: \$2,500
*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$15,400
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount	\$15,400
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$15,400
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DEFERRAL	20.0% Reduction	Adjustment	-\$3,080
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Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes:

Deferral offered for expedited settlement.

PAYABLE PENALTY	\$12,320
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Screening Date 5-May-2014

Docket No. 2014-0670-AIR-E

PCW

Respondent Enbridge G & P (North Texas) L.P.

Policy Revision 4 (April 2014)

Case ID No. 48668

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102888377

Media [Statute] Air

Enf. Coordinator Farhaud Abbaszadeh

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	0	0%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	1	20%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%
Please Enter Yes or No			
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 20%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance
History
Notes

Enhancement for one order with a denial of liability.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 20%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 20%

Screening Date 5-May-2014

Docket No. 2014-0670-AIR-E

PCW

Respondent Enbridge G & P (North Texas) L.P.

Policy Revision 4 (April 2014)

Case ID No. 48668

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102888377

Media [Statute] Air

Enf. Coordinator Farhaud Abbaszadeh

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code §§ 113.1090 and 122.143(4), 40 Code of Federal Regulations §§ 63.6625(b)(3) and 63.6655(d), Tex. Health & Safety Code § 382.085(b), and Federal Operating Permit No. O2953, Special Terms and Conditions No. 1.A.

Violation Description

Failed to record inlet catalyst temperatures. Specifically, the catalyst inlet temperature readings for engines E-2 & E-3 were not recorded at all times from March 6, 2013, through June 13, 2013. The continuous parameter monitoring system ("CPMS") failed to record the 15-minute readings of inlet catalyst temperature 5,266 times for engine E-2 and 5,006 times for engine E-3. Similarly, from July 14, 2013 through December 31, 2013, the CPMS failed to record the 15-minute readings of inlet catalyst temperature 4,376 times for engine E-2 and 7,296 times for engine E-3.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			
Potential			

Percent 0.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor
		X	

Percent 7.0%

Matrix Notes

The Respondent failed to comply with between 30% and 70% of the rule.

Adjustment \$23,250

\$1,750

Violation Events

Number of Violation Events 8

269 Number of violation days

mark only one with an x	daily	
	weekly	
	monthly	
	quarterly	X
	semiannual	
	annual	
	single event	

Violation Base Penalty \$14,000

Eight quarterly events are recommended (four quarterly events for each engine) for the periods from March 6, 2013 through June 13, 2013 and July 14, 2013 through December 31, 2013.

Good Faith Efforts to Comply

10.0% Reduction

\$1,400

	Before NOV	NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary		X
N/A		(mark with x)

Notes

The Respondent completed corrective actions by May 10, 2014, after the April 25, 2014 NOE.

Violation Subtotal \$12,600

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$147

Violation Final Penalty Total \$15,400

This violation Final Assessed Penalty (adjusted for limits) \$15,400

Economic Benefit Worksheet

Respondent Enbridge G & P (North Texas) L.P.
Case ID No. 48668
Reg. Ent. Reference No. RN102888377
Media Air
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
No commas or \$							

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System	\$2,500	6-Mar-2013	10-May-2014	1.18	\$147	n/a	\$147
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

Estimated expense to install a new Supervisory Control and Data Acquisition System and a backup Wonder Ware System to record the measurements of catalyst inlet temperatures as required. The Date Required is the violation start date and the Final Date is the date of compliance.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$2,500

TOTAL

\$147

The TCEQ is committed to accessibility.

To request a more accessible version of this report, please contact the TCEQ Help Desk at (512) 239-4357.



Compliance History Report

PUBLISHED Compliance History Report for CN603042623, RN102888377, Rating Year 2013 which includes Compliance History (CH) components from September 1, 2008, through August 31, 2013.

Customer, Respondent, or Owner/Operator:	CN603042623, Enbridge G & P (North Texas) LP	Classification: SATISFACTORY	Rating: 5.85
Regulated Entity:	RN102888377, BARTON CHAPEL GAS PLANT	Classification: SATISFACTORY	Rating: 2.20
Complexity Points:	4	Repeat Violator:	NO
CH Group:	03 - Oil and Gas Extraction		
Location:	ON NASH ROAD, APPROXIMATELY 0.5 NORTH OF HIGHWAY 2210 IN JACK COUNTY, TEXAS		
TCEQ Region:	REGION 03 - ABILENE		

ID Number(s):

AIR NEW SOURCE PERMITS ACCOUNT NUMBER JA0026U

AIR NEW SOURCE PERMITS REGISTRATION 76462

AIR OPERATING PERMITS PERMIT 2953

AIR EMISSIONS INVENTORY ACCOUNT NUMBER JA0026U

AIR NEW SOURCE PERMITS AFS NUM 4823700013

AIR OPERATING PERMITS ACCOUNT NUMBER JA0026U

AIR OPERATING PERMITS PERMIT 2953

Compliance History Period: September 01, 2008 to August 31, 2013 **Rating Year:** 2013 **Rating Date:** 09/01/2013

Date Compliance History Report Prepared: May 05, 2014

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: May 05, 2009 to May 05, 2014

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: Farhaud Abbaszadeh

Phone: (512) 239-0779

Site and Owner/Operator History:

- | | |
|--|-----|
| 1) Has the site been in existence and/or operation for the full five year compliance period? | YES |
| 2) Has there been a (known) change in ownership/operator of the site during the compliance period? | NO |
| 3) If YES for #2, who is the current owner/operator? | N/A |
| 4) If YES for #2, who was/were the prior owner(s)/operator(s)? | N/A |
| 5) If YES , when did the change(s) in owner or operator occur? | N/A |

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

See addendum for information regarding federal actions.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

Item 1	February 26, 2010	(790890)
Item 2	February 15, 2012	(982142)
Item 3	April 03, 2013	(1073482)

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

N/A

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

Addendum to Compliance History Federal Enforcement Actions

Reg Entity Name: BARTON CHAPEL GAS PLANT

Reg Entity Add: 10 MILES WEST OF PERRIN, TX ON HWY 2210, N

Reg Entity City: PERRIN

Reg Entity No: RN102888377

Customer Name: Barton Chapel Gas Plant (Enbridge
Gathering NTIP)

Customer No: CN603042623

EPA Case No: 06-2010-3314

Order Issue Date (yyyymmdd): 20100910

Case Result: Final Order No Penalty

Statute: CAA

Sect of Statute: 110

Classification: Minor

Program: NESHAPs

Citation:

Violation Type:

Cite Sect:

Cite Part:

Enforcement Action: Administrative Compliance Orders

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
ENBRIDGE G & P (NORTH
TEXAS) L.P.
RN102888377

§
§
§
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§

BEFORE THE

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2014-0670-AIR-E

I. JURISDICTION AND STIPULATIONS

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Enbridge G & P (North Texas) L.P. ("Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent, represented by Mr. Edward Lewis of the law firm of Fulbright & Jaworski LLP, together stipulate that:

1. The Respondent owns and operates a natural gas processing plant located on Nash Road, approximately 0.5 mile north of Highway 2210 in Jack County, Texas (the "Plant").
2. The Plant consists of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
3. The Executive Director and the Respondent agree that the Commission has jurisdiction to enter this Agreed Order, and that the Respondent is subject to the Commission's jurisdiction.
4. The Respondent received notice of the violations alleged in Section II ("Allegations") on or about April 30, 2014.
5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
6. An administrative penalty in the amount of Fifteen Thousand Four Hundred Dollars (\$15,400) is assessed by the Commission in settlement of the violations alleged in

Section II ("Allegations"). The Respondent has paid Twelve Thousand Three Hundred Twenty Dollars (\$12,320) of the administrative penalty and Three Thousand Eighty Dollars (\$3,080) is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Agreed Order. The deferred amount will be waived upon full compliance with the terms of this Agreed Order. If the Respondent fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require the Respondent to pay all or part of the deferred penalty.

7. Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
8. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a).
9. The Executive Director recognizes that the Respondent has implemented the following corrective measures at the Plant:
 - a. On January 16, 2014, switched the pre-catalyst exhaust temperature Programmable Logic Controllers to a new Supervisory Control and Data Acquisition System that is constantly monitored by the Gas Control group to catch and correct disconnects; and
 - b. On May 10, 2014, installed the Wonder Ware System as a backup to record the measurements of catalyst inlet temperatures being taken and retains the collected data for a rolling six month period.
10. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Agreed Order.
11. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
12. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

II. ALLEGATIONS

As owner and operator of the Plant, the Respondent is alleged to have failed to record inlet catalyst temperatures, in violation of 30 TEX. ADMIN. CODE §§ 113.1090 and 122.143(4), 40 CODE OF FEDERAL REGULATIONS §§ 63.6625(b)(3) and 63.6655(d), TEX. HEALTH & SAFETY CODE § 382.085(b), and Federal Operating Permit No. O2953, Special Terms and Conditions No. 1.A., as documented during a record review conducted from February 26, 2014 through March 12, 2014. Specifically, the catalyst inlet temperature readings for engines E-2 & E-3 were not recorded at all times from March 6, 2013, through June 13, 2013. The continuous parameter monitoring system ("CPMS") failed to record the 15-minute readings of inlet catalyst temperature 5,266 times for engine E-2 and 5,006 times for engine E-3. Similarly, from July 14, 2013 through December 31, 2013, the CPMS failed to record the 15-minute readings of inlet catalyst temperature 4,376 times for engine E-2 and 7,296 times for engine E-3.

III. DENIALS

The Respondent generally denies each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that the Respondent pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and the Respondent's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Enbridge G & P (North Texas) L.P., Docket No. 2014-0670-AIR-E" to:

Financial Administration Division, Revenue Operations Section
Attention: Cashier's Office, MC 214
Texas Commission on Environmental Quality
P.O. Box 13088
Austin, Texas 78711-3088
2. The provisions of this Agreed Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Plant operations referenced in this Agreed Order.
3. This Agreed Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
4. This Agreed Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Agreed Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or

otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Agreed Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms "electronic transmission", "owner", "person", "writing", and "written" shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.

5. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to the Respondent, or three days after the date on which the Commission mails notice of the Order to the Respondent, whichever is earlier.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Pamela Marie J
For the Executive Director

10/31/14
Date

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of the entity indicated below my signature, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

Danny Bull
Signature

8-4-2014
Date

Danny Bull
Name (Printed or typed)
Authorized Representative of
Enbridge G & P (North Texas) L.P.

NTX West District Mgr
Title

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Section IV, Paragraph 1 of this Agreed Order.